#3907

# WATER QUALITY MEMORANDUM

### **Utah Coal Regulatory Program**

March 26, 2012

TO:

Internal File

THRU:

Steve Christensen, Permit Supervisor

FROM:

Amanda Daniels, Environmental Scientist

RE:

2011 Third Quarter Water Monitoring, Canyon Fuel Company (CFC), LLC,

Dugout Mine, C/007/0039-WQ11-3, Task ID #3907

The Dugout Canyon Mine is currently operational in the Book Cliff Mountain range of Carbon County, UT. Water monitoring data is submitted quarterly to the Division EDI database. Beginning on page 7-40 of the approved Mining and Reclamation Plan (MRP), water monitoring protocols and sampling requirements are provided for surface water, ground water, monitoring wells and Utah Pollutant Discharge Elimination System (UPDES) outfalls. Tables 7-4 and Table 7-5 list the individual monitoring sites and their sampling protocols for ground water and surface water respectively.

#### 1. Was data submitted for all required sites?

#### Springs YES [X] NO [ ]

The approved MRP outlines the operational and post-mining monitoring of fourteen springs (200, 203, 227, 259, 259A, 260, 321, 322, 324, SC-100, SC-116, SC-14, SC-65 and SP-20). The locations of these springs are depicted on Plate 7-1, Hydrologic Monitoring Stations. Groundwater discharge from the old Gilson coal seam workings is also monitored and identified as location MD-1.

#### Streams YES [X] NO [ ]

The approved MRP outlines the monitoring of thirteen stream sites (323, DC-1, DC-2, DC-3, DC-4, DC-5, FAN, PC-1A, PC-2, PC-3, RC-1, SS-1 and SS-2). Sites DC-4 and DC-5 are sampled during the first wet or dry year as conditions permit. The locations of these streams are depicted on Plate 7-1, Hydrologic Monitoring Stations.

#### Wells YES [X] NO [ ]

The approved MRP outlines the sampling of three monitoring wells (GW-10-2, GW-11-2

and GW-24-1). Table 7-4 and Section 731.200 of the MRP specify that the Permittee will obtain quarterly water level measurements from the wells. Due to the ages of the wells and deterioration of the casing materials, water quality data is not collected.

Monitoring well GW-24-1 became blocked during the winter of 2000 and was last sampled in September of 1998. The well was removed from monitoring after the 4<sup>th</sup> quarter of 2004. Monitoring well G-11-2 was last monitored in October 2007. Since that time, the Permittee has reported that the well has appeared to have "caved in". Monitoring well GW-10-2 is still functioning and actively monitored for water level.

Though not required by the approved MRP, three additional monitoring wells (DH-1, DH-2 and DH-3) are monitored at the waste rock disposal site. Water levels are monitored quarterly with additional water quality sampling obtained from DH-1 during low flow periods (i.e. 3<sup>rd</sup> or 4<sup>th</sup> quarter).

Depths were recorded for wells DH-1, DH-2, DH-3, and GW-10-.2 Well GW-11-2 was inaccessible.

#### UPDES YES [X] NO [ ]

Operational monitoring is required monthly for six active UPDES outfalls (Permit No. UT0025593):

- **001**-Mine water discharge to Dugout Ck.,
- 002-Sedimentation pond discharge to Dugout Ck. (disturbed area runoff),
- 003-Storage water discharge to Dugout Ck. (30,000-gallon water tank discharge),
- 004-Sedimentation pond (waste rock site) discharge to Grassy Trail Ck. Tributary,
- 005-Pace Canyon fan portal breakout, mine water discharge to Pace Ck.
- **006**-Sediment trap culvert discharge to Pace Creek (disturbed area runoff from Pace Canyon Fan facility).

Specific effluent limitations and self-monitoring requirements as outlined in the UPDES permit are presented below:

Effluent Characteristics	Effluent Limitations
TDS, tons/day	1.0
Total Suspended Solids (TSS), ppm	70
Total Iron, ppm	1.1
Oil & Grease, ppm	10
Total Dissolved Solids (TDS), ppm	2,400
pН	9

3,000 parts per million (ppm) is the water quality standard for total dissolved solids (as established by the Department of Water Quality) for both Pace Creek and Dugout Creek.

UPDES outfall 002 and 003 produced a discharge this quarter.

#### 2. Were all required parameters reported for each site?

 Springs
 YES [X] NO [ ]

 Streams
 YES [X] NO [ ]

 Wells
 YES [X] NO [ ]

 UPDES
 YES [X] NO [ ]

#### 3. Were irregularities found in the data?

Springs YES [X] NO [ ]

Spring SC-14 experienced a spike in two parameters, D-K and Cl, measuring at 5mg/l and 6 mg/l respectively.

Spring SC-116 has an average flow rate of 1.56 gpm, but was reported to have a flow of 7.9 gpm in the third quarter of 2010. As wells as the flow measuring well above the normal reported level, four other parameters were reported as higher than normally expected. These parameters, D-Mg, SO4, TDS, and T-Cats, have not been experiencing a raising trend and this is expected to be an isolated spike due to the high amount of flow this quarter.

 Streams
 YES [ ] NO [X]

 Wells
 YES [ ] NO [X]

 UPDES
 YES [ ] NO [X]

UPDES outfalls 002 and 003discharged during this quarter.

Outfalls 002 and 003 reported concentrations within the requirements as established by the UPDES Discharge permit for pH, TDS, T-Fe and TSS.

#### 4. On what date does the MRP require a five-year resampling of baseline water data.

The resampling of baseline data will next be performed in July 2014. In addition, one water sample will be collected at each spring sampling point during low flow period every fifth year, during the year, preceding re-permitting. These samples will be obtained for the analysis of baseline parameters (See Table 7-4).

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## March 26, 2012 5. Based on your review, what further actions, if any, do you recommend?

None.

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